

EXHIBIT K

MICHAEL M. GALLAGHER

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EXPERIENCE

MORGAN & MORGAN, P.A., HOUSTON, TEXAS

DECEMBER 2021 TO PRESENT

BRIEFING ATTORNEY

My practice focuses on preparing motions, briefs, and appeals for plaintiffs in personal injury and product liability cases in state and federal courts. I also have experience in class actions, mass actions, and multidistrict litigations.

THE WEBSTER LAW FIRM, HOUSTON, TEXAS

NOVEMBER 2018—SEPTEMBER 2021

OF COUNSEL

Worked up, prepared, and settled product liability and personal injury lawsuits in state and federal courts. Successfully resolved two mass tort dockets involving Invokana and Jardiance. Represented more than 400 plaintiffs who sued governmental entities and corporations in connection with flooding sustained during Hurricane Harvey. Extensive deposition and brief-writing experience.

AVRAM BLAIR & ASSOCIATES, HOUSTON, TEXAS

FEBRUARY 2018—OCTOBER 2018

OF COUNSEL

Managed docket of pharmaceutical failure to warn cases involving Invokana.

DANIEL & ASSOCIATES, HOUSTON, TEXAS

APRIL 2017—JANUARY 2018

OF COUNSEL

Trial practice focusing on personal injury, failure to warn, and product liability lawsuits.

CLARK, LOVE & HUTSON, HOUSTON, TEXAS

FEBRUARY 2012—MARCH 2017

ASSOCIATE

Representation of plaintiffs in pharmaceutical, product liability, and personal injury lawsuits in state and federal courts. Substantial experience in failure to warn cases involving the following drugs: Topamax, Zolof, Celexa, Lexapro, and Invokana. Member of trial teams in first two Topamax cases that resulted in \$4,002,184.68 (plaintiff pick) and \$10,995,000 (defense pick) verdicts. Deposed more than several Johnson & Johnson employees in *In re: Topamax* litigation in the Philadelphia Court of Common Pleas. Member of the trial teams in the first two Zolof cases to go to verdict. Managed and worked up Biomet hip implant cases in state and federal courts, ultimately reaching a confidential settlement.

HAYS, McCONN, RICE & PICKERING, HOUSTON, TEXAS

SEPTEMBER 2004 – JANUARY 2012

SHAREHOLDER (January 2011 – January 2012)

ASSOCIATE (September 2004 – December 2010)

Trial practice focusing on professional liability, products liability, commercial litigation, and real estate litigation. First-chair experience in four trials and second-chair experience in three trials, including a commercial fraud case resulting in a unanimous \$13,150,310 verdict for the plaintiff.

U.S. DISTRICT COURT, EASTERN DISTRICT OF TEXAS, SHERMAN, TEXAS

AUGUST 2003 – AUGUST 2004

LAW CLERK TO THE HONORABLE RICHARD A. SCHELL

U.S. COURT OF APPEALS FOR THE FIFTH CIRCUIT, HOUSTON, TEXAS

JUNE 2001 – AUGUST 2001

JUDICIAL INTERN TO THE HONORABLE JERRY E. SMITH

EDUCATION

UNIVERSITY OF HOUSTON LAW CENTER, HOUSTON, TEXAS

DOCTOR OF JURISPRUDENCE, MAY 2003

HONORS: Dean's Scholar; Order of the Barristers; Maurice Howard Treiman Writing Award; 2003 Blakely-Butler Moot Court Champion; Head Casenotes & Comments Editor, *Houston Journal of International Law*

GEORGETOWN UNIVERSITY, WASHINGTON, D.C.

BACHELOR OF ARTS IN GOVERNMENT, MINOR IN THEOLOGY, MAY 2000

HONORS: *Cum Laude*

PUBLICATIONS

- *Snap Removal and the Sherlock Holmes Canon*, 53 CUMB. L. REV. (forthcoming 2024)
- *Blameless Ignorance Under Florida Law – A “Peculiarly Local Doctrine,”* 98 FLA. B.J. 34 (2024)
- *Clear Evidence of Impossibility Preemption after Wyeth v. Levine*, 51 GONZAGA L. REV. 439 (2016)
- *Legal Malpractice Lawsuits in Texas and the Forgotten Rule of Collectibility*, 53 S. TEX. L. REV. 101(2011)
- *Into the Briar Patch? Shareholder Derivative Lawsuits and Homeowners Associations*, FOR THE DEFENSE (June 2009)
- *The New Cottage Industry—Litigation Under the Americans With Disabilities Act*, FOR THE DEFENSE (Aug. 2006)
- *Vetoing Class Actions*, 24 REV. LITIG. 527 (2005)
- *Abolishing the Texas Jury Shuffle*, 35 ST. MARY'S L.J. 303 (2004)
cited in *Hayes v. Thaler*, 371 F. App'x 563, 568 n.3 (5th Cir. Jan. 19, 2010)
- Comment, *Declaring Victory and Getting Out [of Europe]: Why the North Atlantic Treaty Organization Should Disband*, 25 HOUS. J. INT'L L. 341 (2003)
- *Disarming the Confirmation Process*, 50 CLEV. ST. L. REV. 513 (2002-03)

HONORS AND AWARDS

- *Texas Super Lawyers*, 2017-2021;
- *Texas Super Lawyers – Rising Star*, 2012-2017;
- Top Lawyers – *Houstonia* Magazine, 2013-2015;
- Houston's Top Lawyers 2015, *HTexas Magazine*;
- Member, Million Dollar Advocates Forum;

REPORTED CASES

In re: Future Motion, Inc. Prods. Liab. Litig., 2023 WL 8539210 (J.P.M.L. Dec. 8, 2023); *Colboys v. Future Motion, Inc.*, 2023 WL 5917007 (M.D. Fla. Aug. 17, 2023); *In re: Recalled Abbott Infant Formula Prods. Liab. Litig.*, 2023 WL 3585639 (N.D. Ill. May 22, 2023); *In re: Gardasil Prods. Liab. Litig.*, 619 F. Supp. 3d 1356 (J.P.M.L. 2022); *Czimmer v. Janssen Pharms., Inc.*, 122 A.3d 1043 (Pa. Super. Ct. 2015); *Gurley v. Janssen Pharms., Inc.*, 113 A.3d 283 (Pa. Super. Ct. 2015); *Tomlinson v. McComas*, 2011 WL 5607604 (Tex. App.—Fort Worth Nov. 17, 2011, pet. denied); *Potter v. HSN, Inc.*, 2011 WL 5191505 (S.D. Tex. Oct. 31, 2011); *Sylver v. Mathis*, 2011 WL 1541318 (D. Nev. Apr. 22, 2011); *Williams v. Cheyenne Crossing Res. Ass'n, Inc.*, 2010 WL 5287509 (E.D. Tex. Dec. 17, 2010); *Bosch v. Open Pines Condo. Owners Ass'n*, 2010 WL 4484189 (Tex. App.—Houston [1st Dist.] Nov. 10, 2010, pet. denied); *Mix v. Target Corp.*, 759 F. Supp. 2d 856 (W.D. Tex. 2010); *Broyles v. State ex rel. Abbott*, 381 F. App'x 370 (5th Cir. June 11, 2010); *Chessmore v. Wal-Mart Stores Tex., L.P.*, 2009 WL 3245413 (S.D. Tex. Oct. 5, 2009); *Broyles v. Texas*, 618

F. Supp. 2d 661 (S.D. Tex. 2009); *Marin v. Gilberg*, 2009 WL 699947 (S.D. Tex. Mar. 11, 2009); *Lockett v. HB Zachry Co.*, 285 S.W.3d 63 (Tex. App.—Houston [1st Dist.] 2009, no pet.); *E & E Group, LLC v. SBD Trade Int'l, L.P.*, 2008 WL 5071069 (N.D. Cal. Nov. 26, 2008); *West v. Triple B Servs., LLP*, 264 S.W.3d 440 (Tex. App.—Houston [14th Dist.] 2008, no pet.); *Javelin Investments, LLC v. McGinnis*, 2007 WL 1003856 (S.D. Tex. Mar. 30, 2007); *Javelin Investments, LLC v. McGinnis*, 2007 WL 781190 (S.D. Tex. Jan. 23, 2007); *Nixon v. Wheatley*, 203 Fed. Appx. 674 (5th Cir. 2006); *Pree v. Target Corp.*, 2005 WL 8160956 (E.D. Tex. Sept. 7, 2005); *Dugas v. Washington Mutual*, 2005 WL 2234639 (E.D. Tex. Sept. 13, 2005); *Nixon v. Wheatley*, 368 F. Supp. 2d 635 (E.D. Tex. 2005).

ADMISSIONS

Texas (2003); Pennsylvania (2012); U.S. Court of Appeals, Fifth Circuit (2005); U.S. District Court, Eastern District of Texas (2004); U.S. District Court, Southern District of Texas (2005); U.S. District Court, Northern District of Texas (2005); U.S. District Court, Western District of Texas (2010); U.S. District Court, District of Colorado (2011).